

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:
	:
- against -	:
	:
STEPHEN M. CALK,	:
	:
<i>Defendant.</i>	:
	:
-----X	

Case No. 19 Cr. 366 (LGS)

**DECLARATION OF  
PAUL H. SCHOEMAN, ESQ.**

**PAUL H. SCHOEMAN, ESQ.**, hereby declares, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, as follows:

1. I am a partner at the law firm of Kramer Levin Naftalis & Frankel LLP, counsel for defendant Stephen M. Calk in the above-captioned action.
2. I submit this Declaration to provide the Court with documents and information pertinent to Mr. Calk's Pretrial Motions.
3. Exhibit A is a copy of the Application and Affidavit for a Search Warrant, *United States v. Cellular Tel.*, No. 17-MC-335 (N.D. Ill. June 26, 2017), ECF No. 1. While the government previously designated this document Highly Confidential in its June 13, 2019 production to the defense, the court unsealed the document on June 21, 2019.
4. Exhibit B is a copy of the Search and Seizure Warrant, *United States v. Cellular Tel.*, No. 17-MC-335 (N.D. Ill. Aug. 2, 2017), ECF No. 4. While the government previously designated this document Highly Confidential in its June 13, 2019 production to the defense, the court unsealed the document on June 21, 2019.

5. Exhibit C is a copy of TFSB Credit Approval Form and Loan Memorandum (November 11, 2016). The Federal Savings Bank (“TFSB”) produced this document to the government in May 2017.

6. Exhibit D is a copy of TFSB Loan Memorandum (January 5, 2017). TFSB produced this document to the government in May 2017.

7. Exhibits E and F are copies of emails from an email chain entitled “Payoff letters” (September 14, 2016). TFSB produced these documents to the government in April 2017.

8. Exhibit G is a copy of a Letter from the Southern District of New York to Paul Schoeman (August 16, 2019). The government has designated the information contained therein as Highly Confidential.

9. Exhibit H is a copy of a Letter from the Southern District of New York to Daniel L. Stein (July 1, 2019). The government has designated the information contained therein as Highly Confidential.

10. Exhibit I is a copy of a Letter from the Southern District of New York to Daniel L. Stein (June 10, 2019). The government has designated the information contained therein as Highly Confidential.

11. Exhibit J is a copy of a Letter from the Southern District of New York to Paul Schoeman (October 15, 2019). The government has designated the information contained therein as Highly Confidential.

12. Exhibit K is a copy of Order, *United States v. Blumberg*, No. 14-CR-458 (JLL) (D.N.J. Jan. 26, 2015).

13. Pursuant to Local Criminal Rule 16.1, I hereby confirm that counsel for Mr. Calk conferred with counsel for the government in a good faith effort to resolve the issues raised by Mr. Calk's discovery motions but the parties were unable to reach an agreement.

Dated: New York, New York  
November 8, 2019

/s/ Paul H. Schoeman  
Paul H. Schoeman